

EXHIBIT A

HIDALGO COUNTY DISTRICT

COURT DOCKET SHEET

[Skip to Main Content](#) [Logout](#) [My Account](#) [Search Menu](#) [New Civil Search](#) [Refine Search](#) [Back](#)
Location : All Courts [Images](#)**REGISTER OF ACTIONS**CASE No. CL-19-6054-F

Isidro Casanova VS. LA JOYA CITY COUNCIL, CITY OF LA JOYA

§
§
§
§
§

Case Type: Injury or Damage - Other (OCA)

Date Filed: 11/18/2019

Location: County Court at Law #6

PARTY INFORMATION

Defendant CITY OF LA JOYA

Attorneys

Defendant LA JOYA CITY COUNCIL

Plaintiff Casanova, Isidro

ROBERTO JACKSON, Jr.

Retained

956-585-6938(W)

EVENTS & ORDERS OF THE COURT**OTHER EVENTS AND HEARINGS**

11/18/2019 [Original Petition \(OCA\)](#)
 11/18/2019 [Order Filed](#)
 11/18/2019 [Affidavit](#)
 11/18/2019 [Order Filed](#)
 11/18/2019 [Order Filed](#)
 11/18/2019 [Order Filed](#)
 11/18/2019 [Citation Issued](#)
 11/18/2019 [Citation Issued](#)
 11/18/2019 [Order, Signed](#)
 ORD FOR ISSUANCE OF TRO AND OSH FOR TEMP INJUCTION
 11/18/2019 [Order Setting Hearing](#)
 SET FOR 12/2/2019
 11/18/2019 [Temporary Restraining Order, Signed](#)
 11/18/2019 [Temporary Restraining Order Issued / Returned](#)
 CITY OF LA JOYA
 11/18/2019 [Temporary Restraining Order Issued / Returned](#)
 LA JOYA CITY COUNCIL
 11/18/2019 [Bond](#)
 TRO BOND \$100.00 46/212 REC.#2019-052616 PAID BY ROBERTO JACKSON,JR.
 11/18/2019 [Order Filed](#)
 TRO
 11/18/2019 [Order Filed](#)
 ORD ON ISSUANCE FOR TRO AND OSH FOR TEMP INJUCTIONS
 11/21/2019 [Temporary Restraining Order Issued / Returned](#)
 CITY OF LA JOYA
 11/21/2019 [Temporary Restraining Order Issued / Returned](#)
 LA JOYA CITY COUNCIL
 11/21/2019 [Citation Returned Served](#)
 11/21/2019 [Citation Returned Served](#)
 12/02/2019 Temporary Restraining Order Hearing (9:00 AM) ()

FINANCIAL INFORMATION

	Plaintiff Casanova, Isidro		
	Total Financial Assessment		292.00
	Total Payments and Credits		292.00
	Balance Due as of 11/27/2019		0.00
11/18/2019	Transaction Assessment		282.00
11/18/2019	EFile Payments from		
	TexFile	Receipt # 2019-052613	Casanova, Isidro
			(282.00)
11/18/2019	Transaction Assessment		10.00
11/18/2019	Payment	Receipt # 2019-052614	Salinas, Jose Adolfo
			(10.00)

EXHIBIT B

**PLAINTIFF'S ORIGINAL
PETITIONS, REQUEST FOR
TEMPORARY RESTRAINING
ORDER AND
DECLARATORY JUDGMENT**

CAUSE NO. CL-19-6054-F

THE STATE OF TEXAS
COUNTY OF HIDALGO

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you."

To: CITY OF LA JOYA
BY SERVING ITS REGISTERED AGENT
JOSE ADOLFO SALINAS
701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER HE MAY BE FOUND
OR JACQUELINE SALINAS BAZAN
701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER SHE MAY BE FOUND

GREETINGS: You are commanded to appear by filing a written answer to the Plaintiff's petition at or before 10 o'clock A.M. on or before the Monday next after the expiration of twenty (20) days after the date of service hereof, before the Honorable County Court At Law #6 of Hidalgo County, Texas, by and through the Hidalgo County Clerk at 100 N. Closner, First Floor, Edinburg, Texas 78539.

Said Plaintiff's Petition was filed in said Court, on the 18th day of November, 2019 in this Cause Numbered CL-19-6054-F on the docket of said Court, and styled,

ISIDRO CASANOVA
vs.
JOSE ADOLFO SALINAS; JAQUELINE SALINAS

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this Citation and made a part hereof.

NAME & ADDRESS OF ATTORNEY FOR PLAINTIFF:
ROBERTO JACKSON, JR.
412 PALMVIEW COMMERCIAL DRIVE
PALMVIEW TX 78574

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF SAID COURT, at Edinburg, Texas this 18th day of November, 2019.



ARTURO GUAJARDO, JR.
COUNTY CLERK, HIDALGO COUNTY, TEXAS
100 N. CLOSNER
EDINBURG, TEXAS 78539
COUNTY COURT AT LAW #6

BY Aurelio Aleman DEPUTY
AURELIO ALEMAN

SHERIFF'S/CONSTABLE'S/CIVIL PROCESS

SHERIFF'S RETURN

Came to hand on the 18 day of Nov, 20 19, at 1000 o'clock AM
M., by Deputy (Sheriff/Constable)/Civil Process Server and to-wit the following:

DEFENDANT SERVED

Service was EXECUTED on the above referenced Defendant, in person, in Hidalgo County, Texas and served with a true copy of this Citation, with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Petition, at the following Date, time, and place, to-wit:

NAME LA JOYA CITY COUNCIL DATE 11-18-19 TIME 11:20 AM PLACE 701 E YARMES WAY #3
JOSE ADOLFO SALINAS / JACQUELINE SALINAS BAZAR LA JOYA
By: Fernando CIVIL PROCESS SERVER By: _____ DEPUTY SHERIFF/CONSTABLE

DEFENDANT NOT SERVED

Service was ATTEMPTED at the above address on the above referenced Defendant on the following date(s) and time(s), but to no avail:

NAME _____ DATE _____ TIME _____ PLACE _____

NAME _____ DATE _____ TIME _____ PLACE _____

NAME _____ DATE _____ TIME _____ PLACE _____

By: _____
CIVIL PROCESS SERVER

By: _____
DEPUTY SHERIFF/CONSTABLE

**COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF,
CONSTABLE OR CLERK OF THE COURT**

In accordance to rule 107, the officer or authorized person who serves or attempts to serve a citation must sign the return. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return must either be verified or be signed under the penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is _____, my date of birth is _____ and my address is _____
_____. I declare under penalty of perjury that the foregoing is true and correct

EXECUTED in _____ County, state of Texas, on the ____ day of _____, 20 ____.

DECLARANT

If Certified by the Supreme Court of Texas
Date of Expiration /SCH Number

CL-19-6054-F
NO. _____

ISIDRO CASANOVA

§ IN THE COUNTY COURT AT LAW

§

§

Petitioner,

§

§

V.

§ NO. _____

§

CITY OF LA JOYA and the La Joya City
Council
Respondents.

§

§ HIDALGO COUNTY, TEXAS

PETITIONER'S ORIGINAL PETITION**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COME Isidro Casanova, hereinafter called Petitioner, complaining of and about City of La Joya and the La Joya City Council, hereinafter called Respondents, and for cause of action show unto the Court the following:

DISCOVERY CONTROL PLAN LEVEL

1. Petitioner intend that discovery be conducted under Discovery Level 2.

PARTIES AND SERVICE

2. Petitioner, Isidro Casanova, is an Individual whose address is 512 Lakepoint, La Joya, Texas 78560.

3. Respondents City of La Joya and the La Joya City Council, may be served with process by serving either the City Administrator of said municipality, Jacqueline Salinas Bazan, at 701 East Expressway 83, La Joya, Texas or wherever she may be found; or by serving the mayor, Jose Adolfo Salinas at 701 East Expressway 83, La Joya, Texas or wherever he may be found. Service of said Respondents as described above can be effected by personal delivery.

CL-19-6054-F

JURISDICTION AND VENUE

4. The subject matter in controversy is within the jurisdictional limits of this court.
5. Petitioner seek:
 - a. injunctive relief or in the alternative monetary relief of \$100,000 or less, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees.
6. This court has jurisdiction over the parties because Respondent is a Texas entity incorporated under the laws of Texas.
7. Venue in Hidalgo County is proper in this cause.

FACTS

8. On November 15, 2019, the City Council for the City of La Joya posted a flier calling for a Special Meeting on Monday, November 18, 2019 at 12:00 p.m..
9. In said flier, the City Council seeks to enter into employment contract with various employees of the City of La Joya which are currently being paid on an hourly basis.

ISIDRO CASANOVA'S CLAIM

10. Said contracts would constitute a financial burden upon the City's budget well beyond the current fiscal year. Said contracts were not budgeted for this current fiscal year and constitute an usurpation of an administration's ability to formulate a fiscally responsible budget in the future.

DAMAGES FOR PLAINTIFF, ISIDRO CASANOVA

11. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff, Isidro Casanova, and all other citizens for the City of La Joya, will be caused to suffer a loss of fiduciary duty and responsibility.

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PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner, Isidro Casanova, respectfully prays that the Respondents be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Petitioner against Respondents for injunctive relief or for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Petitioner may be entitled at law or in equity.

Respectfully submitted,

By: **Roberto Jackson, Jr.**
Roberto Jackson, Jr.
Texas Bar No. 00793195
Email: robertojackson43@gmail.com
412 Palmview-Commercial Dr.
Palmview, Texas 78574
Tel. (956) 585-6938
Fax. (956) 581-8020
Attorney for Petitioner
Isidro Casanova

CL-19-5704-F

NO. _____

ISIDRO CASANOVA

§ IN THE COUNTY COURT AT LAW

§

§

Petitioner,

§

§

V.

§

NO. _____

§

CITY OF LA JOYA and the La Joya City
Council

§

Respondents.

§

HIDALGO COUNTY, TEXAS

PETITIONER'S ORIGINAL PETITION**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COME Isidro Casanova, hereinafter called Petitioner, complaining of and about City of La Joya and the La Joya City Council, hereinafter called Respondents, and for cause of action show unto the Court the following:

DISCOVERY CONTROL PLAN LEVEL

1. Petitioner intend that discovery be conducted under Discovery Level 2.

PARTIES AND SERVICE

2. Petitioner, Isidro Casanova, is an Individual whose address is 512 Lakepoint, La Joya, Texas 78560.

3. Respondents City of La Joya and the La Joya City Council, may be served with process by serving either the City Administrator of said municipality, Jacqueline Salinas Bazan, at 701 East Expressway 83, La Joya, Texas or wherever she may be found; or by serving the mayor, Jose Adolfo Salinas at 701 East Expressway 83, La Joya, Texas or wherever he may be found. Service of said Respondents as described above can be effected by personal delivery.

CL-19-5704-F

JURISDICTION AND VENUE

4. The subject matter in controversy is within the jurisdictional limits of this court.
5. Petitioner seek:
 - a. injunctive relief or in the alternative monetary relief of \$100,000 or less, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees.
6. This court has jurisdiction over the parties because Respondent is a Texas entity incorporated under the laws of Texas.
7. Venue in Hidalgo County is proper in this cause.

FACTS

8. On October 30, 2019, the City Council for the City of La Joya posted a flier calling for a Special Meeting on Saturday, November 2, 2019 at 9:00 a.m..
9. In said flier, the City Council seeks to enter into employment contract with various employees of the City of La Joya which are currently being paid on an hourly basis.

ISIDRO CASANOVA'S CLAIM FOR BREACH OF CONSTITUTIONAL AUTHORITY

10. The La Joya City Councils actions seek to undermine the electoral process by projecting the current administration's authority well beyond their elected term. Said actions constitute an unconstitutional infringement upon the rights of voters for the City of La Joya. Under the Texas Constitution, voters are given the right to elect political leaders of their choice; and in return, said elected officials are to govern as they see fit.

Also, said contracts would constitute a financial burden upon the City's budget well beyond the current fiscal year. Said contracts were not budgeted for this current fiscal year and constitute an usurpation of an administration's ability to formulate a fiscally responsible budget

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in the future.

DAMAGES FOR PLAINTIFF, ISIDRO CASANOVA

11. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff, Isidro Casanova, and all other citizens for the City of La Joya, will be caused to suffer a loss of fiduciary duty and responsibility and will have their right to vote disenfranchised.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner, Isidro Casanova, respectfully prays that the Respondents be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Petitioner against Respondents for injunctive relief or for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Petitioner may be entitled at law or in equity.

Respectfully submitted,

By: **Roberto Jackson, Jr.**
Roberto Jackson, Jr.
Texas Bar No. 00793195
Email: robertojackson43@gmail.com
412 Palmview-Commercial Dr.
Palmview, Texas 78574
Tel. (956) 585-6938
Fax. (956) 581-8020
Attorney for Petitioner
Isidro Casanova

CL-19-6054-F
NO. _____ISIDRO CASANOVA
Petitioner,

V.

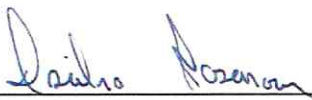
CITY OF LA JOYA AND LA JOYA
CITY COUNCIL
Respondents.§ IN THE COUNTY COURT AT LAW
§
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§ NO. ____
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§ HIDALGO COUNTY, TEXAS**AFFIDAVIT IN SUPPORT OF
PETITIONER'S APPLICATION FOR TEMPORARY RESTRAINING ORDER**

BEFORE ME, the undersigned authority, personally appeared Isidro Casanova, who being duly sworn, deposed as follows:

"My name is Isidro Casanova. I am at least 18 years of age and of sound mind. I am personally acquainted with the facts alleged herein.

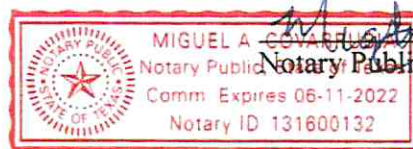
"I am a resident of the City of La Joya who is also running for the position of Mayor of the City of La Joya. The actions proposed by the current City Council for the City of La Joya would constrain any and all future administrations from putting forth a fiscally responsible budget for the City of La Joya. Specifically, awarding employment contracts to 14 current city employees (see Exhibit A attached hereto).

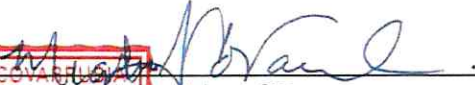
"Further affiant sayeth not."



Isidro Casanova

SUBSCRIBED AND SWORN TO BEFORE ME on November 16th, 2019 by
Isidro Casanova.





Miguel A. Covarrubias
Notary Public, State of Texas
Comm. Expires 06-11-2022
Notary ID 131600132

CL-19-6054-F

**TAKE NOTICE THAT A SPECIAL MEETING
WILL BE HELD AT THE MUNICIPAL BUILDING
LOCATED AT 701 E. EXPRESSWAY 83, LA JOYA, TX. 78560
COMMENCING AT 12:00 P.M.
MONDAY, NOVEMBER 18, 2019**

during the course of this meeting, the governing body may retire into a closed session pursuant to the Texas Code, Chapter 551 on any authorized subject. The governing body may recess from day to day when it deems consideration of a particularly long subject as authorized by law.

AGENDA

OPEN MEETING AND ROLL CALL

- a) Discussion and possible action on the excusing of any absent member of governing body.
- b) Invocation and Pledge of Allegiance.

ADMINISTRATIVE

Discussion and action, if any, on the following:

- a) Agreement Between City of La Joya and City Administrator.
- b) Agreement Between City of La Joya and City Attorney.
- c) Agreement between City of La Joya and External Auditor/Comptroller.
- d) Agreement Between City of La Joya and Public Works Director.
- e) Agreement Between City of La Joya and Water Plant Director.
- f) Agreement between City of La Joya and Public Utilities Director.
- g) Agreement Between City of La Joya and Code Enforcer.
- h) Agreement Between City of La Joya and Finance Clerk.
- i) Agreement Between City of La Joya and City Clerk.
- j) Agreement Between City of La Joya and City Marketing Clerk.
- k) Agreement Between City of La Joya and Court Coordinator & Clerk.
- l) Agreement Between City of La Joya and PD Dispatch Clerk.
- m) Agreement Between City of La Joya and Library Director.
- n) Agreement Between City of La Joya and Senior Center Director.

3. CLOSED SESSION

3. CLOSED SESSION

CL-19-6054-F

In Accordance with Chapter 551 of the Texas Government Code, La Joya City Council gives notice that it may meet in a closed, executive session to discuss the items listed (2-10) on the public portion of the meeting agenda in accordance with the following below:

Pursuant to Section 551.071, the City may convene in a closed, non-public meeting with its attorney and discuss any matters related to discussion of legal advice on pending or contemplated litigation, and/or on a matter in which the duty of the attorney to the governmental body under the Texas Disciplinary Rules of Professional Conduct of the State Bar of Texas clearly conflicts with this chapter. The City and its attorney may also discuss such issues with the appropriate staff so as to obtain necessary and relevant information so that such discussion is informative and developed.

Pursuant to Section 551.072, the City may convene in a closed, non-public meeting to discuss any matters related to real property and deliberate the purchase, exchange, lease, or value of real property as such would be detrimental to negotiations between the Cities and a third party in an open meeting. The City and its attorney may also discuss such issues with the appropriate staff so as to obtain necessary and relevant information so that such discussion is informative and developed.

Pursuant to Section 551.074, the City may convene in a closed, non-public meeting to discuss any matters related to appointment, employment, evaluation, reassignment, duties and discipline or dismissal of a public officer including the Municipal Judge. The City and its attorney may also discuss such issues with the appropriate staff including members so as to obtain necessary and relevant information so that such discussion is informative and developed.

Pursuant to Section 551.075, the City may convene in a closed, non-public meeting to discuss any matters with any and all employees to receive information or question the employees. The City and its attorney may also discuss such issues with the appropriate staff so as to obtain necessary and relevant information so that such discussion is informative and developed.

Pursuant to Section 551.076, the City may convene in a closed, non-public meeting to discuss any matters on the deployment, or specific occasions for implementation, of security personnel or devices. The City and its attorney may also discuss such issues with the appropriate staff so as to obtain necessary and relevant information so that such discussion is informative and developed.

Pursuant to Section 551.084, the City may convene in a closed, non-public meeting to discuss any matters involving an investigation and may exclude a witness from hearing during the examination of another witness in the investigation. The City and its attorney may also discuss such issues with the appropriate staff so as to obtain necessary and relevant information so that such discussion is informative and developed.

Pursuant to Section 551.086, the City may convene in a closed, non-public meeting to discuss any matters regarding economic development issues. The City and its attorney may also discuss such issues with the appropriate staff so as to obtain necessary and relevant information so that such discussion is informative and developed.

4. RECONVENE into Regular Session, consider action if necessary on any item(s) discussed in closed session.

5. ADJOURNMENT.

I, the undersigned authority, do hereby certify that the above notice of said Special Meeting of the governing body of the City of La Joya was posted on the bulletin board at City Hall. Notice was posted on the 15th day of November, 2019, at 11:10 a.m. and will remain posted continuously for at least 72 hours preceding the scheduled time of said Meeting, in compliance with Chapter 551 of the Government Code.

POSTED ON THIS 15th DAY OF November, 2019 at 11:10 a.m.

Julianita Sabala
City Secretary, Julianita Sabala

NO. CL-19-6054-F**ISIDRO CASANOVA****Petitioner,****V.****CITY OF LA JOYA AND LA JOYA
CITY COUNCIL****Respondents.**§ **IN THE COUNTY COURT AT LAW**

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§

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NO. _____

HIDALGO COUNTY, TEXAS

**PETITIONER'S APPLICATION FOR
TEMPORARY RESTRAINING ORDER, TEMPORARY INJUNCTION
AND PERMANENT INJUNCTION**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Isidro Casanova, Petitioner herein, and files this Petitioner's Application for Temporary Restraining Order and Temporary and Permanent Injunction against City of La Joya and La Joya City Council, Respondents herein, and in support thereof, shows the court the following:

PARTIES AND SERVICE

1. Petitioner, Isidro Casanova, is an Individual.
2. Respondent City of La Joya, a municipality, may be served with process by serving either the City Administrator of said municipality, Jacqueline Salinas Bazan, at 701 East Expressway 83, La Joya, Texas or wherever she may be found; or by serving the mayor, Jose Adolfo Salinas at 701 East Expressway 83, La Joya, Texas or wherever he may be found. Service of said Defendant as described above can be effected by personal delivery.
3. Respondent La Joya City Council, may be served with process by serving either the City Administrator of said municipality, Jacqueline Salinas Bazan, at 701 East Expressway 83, La Joya, Texas or wherever she may be found; or by serving the mayor, Jose Adolfo Salinas

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at 701 East Expressway 83, La Joya, Texas or wherever he may be found. Service of said Defendant as described above can be effected by personal delivery.

JURISDICTION AND VENUE

4. The subject matter in controversy is within the jurisdictional limits of this court.

5. Petitioner seeks:

a. injunctive relief or monetary relief of \$100,000 or less, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees.

6. This court has jurisdiction over the parties because Respondents are Texas residents.

7. Venue in Hidalgo County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

FACTS

8. On November 15, 2019, the City Council for the City of La Joya posted a flier calling for a Special Meeting on Monday, November 18, 2019 at 12:00 p.m..

In said flier, the City Council seeks to enter into employment contract with various employees of the City of La Joya which are currently being paid on an hourly basis.

9. Unless City of La Joya and La Joya City Council, Respondents herein, are immediately enjoined and restrained, Petitioner will suffer irreparable harm.

ELEMENTS FOR INJUNCTIVE RELIEF

10. In light of the above described facts, Petitioner seeks recovery from Respondents. The nature of the lawsuit is the constraint of future administration from producing fiscally responsible budgets.

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11. Petitioner is likely to succeed on the merits of this lawsuit because the contemplated contracts are illegal.

12. Unless this Honorable Court immediately restrains the Respondents, the Petitioner will suffer immediate and irreparable injury, for which there is no adequate remedy at law to give Petitioner complete, final and equal relief. More specifically, Petitioner will show the court the following:

a. The harm to Petitioner is imminent because the meeting is scheduled for Monday, November 18, 2019.

b. This imminent harm will cause Petitioner irreparable injury in that it will constrain the ability of any future administration from putting forth a fiscally responsible budget.

c. There is no adequate remedy at law which will give Petitioner complete, final and equal relief because once the contracts are signed, it will require further action from the city council to undo and it will involve costly litigation.

BOND

13. Petitioner is willing to post a reasonable temporary restraining order bond and requests the court to set such bond.

REMEDY

14. Petitioner has met Petitioner's burden by establishing each element which must be present before injunctive relief can be granted by this court, therefore Petitioner is entitled to the requested temporary restraining order.

15. Petitioner requests the court to restrain Respondents from holding the special called meeting for Monday November 18, 2019 at 12:00 p.m..

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16. It is essential that the court immediately and temporarily restrain City of La Joya and La Joya City Council, Respondents herein, from holding the special called meeting for November 18, 2019. It is essential that the court act immediately, prior to giving notice to Respondents and a hearing on the matter because the scheduled meeting is to take place on Monday, November 18, 2019 at 12:00 p.m..

17. In order to preserve the status quo during the pendency of this action, Petitioner requests that the Respondents be temporarily enjoined from holding the special called meeting for November 18, 2019.

18. On final trial on the merits, that the Court permanently enjoin City of La Joya and La Joya City Council, Respondents herein, from holding the special called meeting for November 18, 2019.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Isidro Casanova, Petitioner herein, respectfully prays that:

- a. City of La Joya and La Joya City Council, Respondents, will be cited to appear and answer herein;
- b. A temporary restraining order will issue without notice to City of La Joya and La Joya City Council, Respondents, restraining Respondents, Respondents' officers, agents, servants, employees, agents, servants, successors and assigns, and attorneys from directly or indirectly holding the special called meeting for November 18, 2019;
- c. The Court sets a reasonable bond for the temporary restraining order;
- d. After notice and hearing, a temporary injunction will issue enjoining and restraining City of La Joya and La Joya City Council, Respondents, Respondents'

CL-19-6054-F

officers, agents, servants, employees, successors and assigns, and attorneys from directly or indirectly holding the special called meeting for November 18, 2019;

e. After trial on the merits, the Court permanently enjoin City of La Joya and La Joya City Council, Respondents, Respondents' officers, agents, servants, employees, successors and assigns, and attorneys from directly or indirectly holding the special called meeting for November 18, 2019.

f. For such other and further relief, in law or in equity, to which Petitioner may be justly entitled.

Respectfully submitted,

By: /s/Roberto Jackson, Jr.
Roberto Jackson, Jr.
Texas Bar No. 00793195
Email: robertojackson43@gmail.com
412 Palmview-Commercial Dr.
Palmview, Texas 78574
Tel. (956) 585-6938
Fax. (956) 581-8020
Attorney for Petitioner
Isidro Casanova

EXHIBIT C

TEMPORARY RESTRAINING

ORDER

TEMPORARY RESTRAINING ORDER

THE STATE OF TEXAS

CASE NO. CL-19-6054-F

TO: LA JOYA CITY COUNCIL
BY SERVING ITS REGISTERED AGENT
JOSE ADOLFO SALINAS
701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER HE MAY BE FOUND
OR JACQUELINE SALINAS BAZAN
701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER SHE MAY BE FOUND

Whereas ISIDRO CASANOVA filed a petition in the County Court at Law of Hidalgo County, Texas, on, the 18th day of November, 2019 in a suit numbered CL-19-6054-F on the docket of said Court, wherein ISIDRO CASANOVA is Plaintiff and LA JOYA CITY COUNCIL; CITY OF LA JOYA Defendant, alleging a cause of action and the action of the Judge thereon, all of which is more fully shown by a true and correct copy of PLAINTIFF Petition and the Judge's fiat thereon which are attached hereto; and

Whereas, the said PLAINTIFF has executed and filed with the Clerk a Bond in the sum of \$100.00 payable and conditioned as required by law and the order of the Judge;

YOU ARE THEREFORE COMMANDED TO TAKE NOTICE OF SUCH PETITION, and to desist and refrain from

*** PLEASE SEE ATTACHED CERTIFIED COPY OF DOCUMENTS ***

and obey and execute the order of the Judge until and pending the hearing of such petition in the Courtroom of this Court in Edinburg, Texas, on the 2nd day of December at 9 o'clock when and where you will appear to show cause why injunction should not be granted upon such petition effective until final decree in such suit.

ISSUED this the 18th day of November, 2019

WITNESS: ARTURO GUAJARDO, JR. of the County Court at Law of Hidalgo County, Texas,

Given under my hand and seat of office, at Edinburg, Texas, this the 18th day of November, 2019.

Deputy



ATTEST: ARTURO GUAJARDO, JR.
COUNTY CLERK, HIDALGO COUNTY, TEXAS
100 N CLOSNER
EDINBURG, TEXAS 78539
COUNTY COURT AT LAW #6

By: Aurelio Aleman Deputy
AURELIO ALEMAN

Taxed _____

Return Recorded _____

SHERIFF'S RETURN

Came to hand the 18 day of Nov, 2019, at 1600 o'clock A.M.,
and executed the 18 day of Nov, 20 19, at 1120 o'clock, 4.M., by
delivering to the within named Defendant LA Joya city council
at LA Joya in Hidalgo County, Texas, in person, a
true copy of this Writ of Temporary Restraining Order and Notice, and the accompanying
copy of Plaintiff's Petition.

Fees - - \$ _____

Mileage - _____

Total - - \$ _____

J. E. "Eddie" Guerra, Hidalgo County Sheriff

By: Juan M. M., Deputy

WRIT OF TEMPORARY RESTRAINING ORDER AND
NOTICE

Electronically Submitted
11/18/2019 12:00 AM
Hidalgo County Clerk
Accepted by: Aurelio Aleman

NO. CL-19-6054-F

ISIDRO CASANOVA
Petitioner,

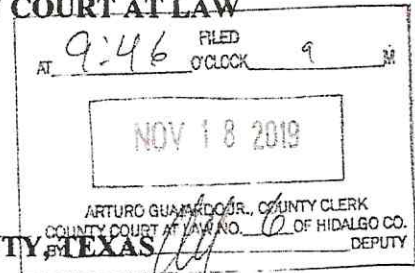
V.

CITY OF LA JOYA AND LA JOYA
CITY COUNCIL
Respondents.

§ **IN THE COUNTY COURT AT LAW**

§ NO. _____

§ **HIDALGO COUNTY, TEXAS**



TEMPORARY RESTRAINING ORDER

On November 18, 2019, 2019, the Application for a Temporary Restraining Order of Isidro Casanova, Petitioner herein, was heard before this court.

Based upon the pleadings, records, documents filed by counsel, and the arguments of counsel at the hearing, IT CLEARLY APPEARS:

A. That unless City of La Joya and La Joya City Council, Respondents, are immediately restrained from holding a special meeting on November 18, 2019, that City of La Joya and La Joya City Council will commit the foregoing before notice and a hearing on Petitioner's Application for Temporary Injunction.

B. Petitioner will suffer irreparable harm if City of La Joya and La Joya City Council are not restrained immediately because it will constrain the ability of any future administration from putting forth a fiscally responsible budget and there is no adequate remedy at law to grant Petitioner complete, final and equal relief.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that City of La Joya and La Joya City Council, Respondents herein, and all of Respondents' officers, agents, servants, employees, agents, servants, successors and assigns, and attorneys are ORDERED to immediately cease and desist from holding a special meeting on November 18, 2019 from the date of entry of this order until fourteen (14) days thereafter, or until further order of this Court.



Date: NOV 18 2019
I, Arturo Guajardo, Jr. County Clerk do hereby certify that this is a true and correct copy of the original document filed in my office.
By: _____
Deputy Clerk

Electronically Submitted
11/18/2019 12:00 AM
Hidalgo County Clerk
Accepted by: Aurelio Aleman

CL-19-6054-F

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Petitioner's Application for Temporary Injunction be heard on 12/2/19 at 9:00 A. M in the County Court No 6. Respondents City of La Joya and La Joya City Council are commanded to appear at that time and show cause, if any exist, why a temporary injunction should not be issued against said Respondents.

The clerk of the above-entitled court shall issue a temporary restraining order in conformity with the law and the terms of this order upon the filing by Petitioner of the bond hereinafter set.

This order shall not be effective until Petitioner deposits with the Clerk, a bond in the amount of \$100.00 in conformity with the law.

SIGNED and ENTERED on 11/18/2019 at 9:30 A.M.

CIV

PRESIDING JUDGE



NOV 18 2019

Date: _____
I, Arturo Guajardo, Jr. County Clerk do
hereby certify that this is a true and
correct copy of the original document
filed in my office.
By: _____
Deputy Clerk

CL-19-6054-F

VERIFICATION

STATE OF TEXAS

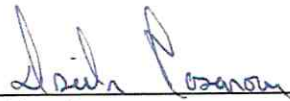
§

§

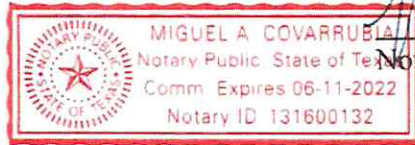
COUNTY OF HIDALGO

§

BEFORE ME, the undersigned authority, personally appeared Isidro Casanova, who, on oath, stated that the statements made in the foregoing Application for Temporary Restraining Order, Temporary Injunction and Permanent Injunction are true and correct.


Isidro Casanova

SUBSCRIBED AND SWORN TO BEFORE ME on this the 16th day of November, 2019, to certify which witness my hand and seal of office.




Notary Public, State of Texas

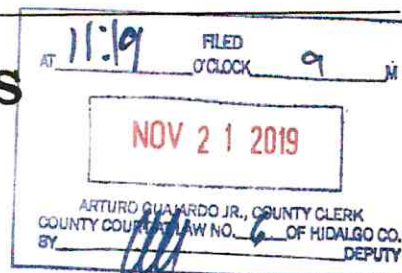
EXHIBIT D

RETURN SERVICE

TEMPORARY RESTRAINING ORDER

THE STATE OF TEXAS

CASE NO. CL-19-6054-F



TO: CITY OF LA JOYA
 BY SERVING ITS REGISTERED AGENT
 JOSE ADOLFO SALINAS
 701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER HE MAY BE FOUND
 OR JACQUELINE SALINAS BAZAN
 701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER SHE MAY BE FOUND

Whereas ISIDRO CASANOVA filed a petition in the County Court at Law of Hidalgo County, Texas, on, the 18th day of November, 2019 in a suit numbered CL-19-6054-F on the docket of said Court, wherein ISIDRO CASANOVA is Plaintiff and LA JOYA CITY COUNCIL; CITY OF LA JOYA Defendant, alleging a cause of action and the action of the Judge thereon, all of which is more fully shown by a true and correct copy of PLAINTIFF Petition and the Judge's fiat thereon which are attached hereto; and

Whereas, the said PLAINTIFF has executed and filed with the Clerk a Bond in the sum of \$100.00 payable and conditioned as required by law and the order of the Judge;

YOU ARE THEREFORE COMMANDED TO TAKE NOTICE OF SUCH PETITION, and to desist and refrain from

*** PLEASE SEE ATTACHED CERTIFIED COPY OF DOCUMENTS ***

and obey and execute the order of the Judge until and pending the hearing of such petition in the Courtroom of this Court in Edinburg, Texas, on the 2nd day of December at 9 o'clock when and where you will appear to show cause why injunction should not be granted upon such petition effective until final decree in such suit.

ISSUED this the 18th day of November, 2019

WITNESS: ARTURO GUAJARDO, JR. of the County Court at Law of Hidalgo County, Texas,

Given under my hand and seat of office, at Edinburg, Texas, this the 18th day of November, 2019.

Deputy



ATTEST: ARTURO GUAJARDO, JR.
 COUNTY CLERK, HIDALGO COUNTY, TEXAS
 100 N CLOSNER
 EDINBURG, TEXAS 78539
 COUNTY COURT AT LAW #6

By: Aurelio Aleman Deputy
 AURELIO ALEMAN

Taxed _____

Return Recorded _____

SHERIFF'S RETURN

Came to hand the 18 day of Nov, 2019, at 830 o'clock A.M.,
 and executed the 18 day of Nov, 2019, at 200 o'clock, P.M., by
 delivering to the within named Defendant LA Joya cement Jose Acosta - LSA
 at LA Joya in Hidalgo County, Texas, in person, a
 true copy of this Writ of Temporary Restraining Order and Notice, and the accompanying
 copy of Plaintiff's Petition.

Fees - - \$ _____

J. E. "Eddie" Guerra, Hidalgo County Sheriff

Mileage - _____

By: Frank Pineda, Deputy

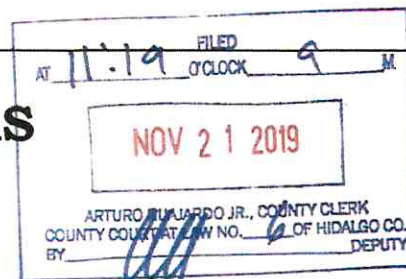
Total - - \$ _____

WRIT OF TEMPORARY RESTRAINING ORDER AND
 NOTICE

TEMPORARY RESTRAINING ORDER

THE STATE OF TEXAS

CASE NO. CL-19-6054-F



TO: LA JOYA CITY COUNCIL
 BY SERVING ITS REGISTERED AGENT
 JOSE ADOLFO SALINAS
 701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER HE MAY BE FOUND
 OR JACQUELINE SALINAS BAZAN
 701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER SHE MAY BE FOUND

Whereas ISIDRO CASANOVA filed a petition in the County Court at Law of Hidalgo County, Texas, on, the 18th day of November, 2019 in a suit numbered CL-19-6054-F on the docket of said Court, wherein ISIDRO CASANOVA is Plaintiff and LA JOYA CITY COUNCIL; CITY OF LA JOYA Defendant, alleging a cause of action and the action of the Judge thereon, all of which is more fully shown by a true and correct copy of PLAINTIFF Petition and the Judge's fiat thereon which are attached hereto; and

Whereas, the said PLAINTIFF has executed and filed with the Clerk a Bond in the sum of \$100.00 payable and conditioned as required by law and the order of the Judge;

YOU ARE THEREFORE COMMANDED TO TAKE NOTICE OF SUCH PETITION, and to desist and refrain from

*** PLEASE SEE ATTACHED CERTIFIED COPY OF DOCUMENTS ***

and obey and execute the order of the Judge until and pending the hearing of such petition in the Courtroom of this Court in Edinburg, Texas, on the 2nd day of December at 9 o'clock when and where you will appear to show cause why injunction should not be granted upon such petition effective until final decree in such suit.

ISSUED this the 18th day of November, 2019

WITNESS: ARTURO GUAJARDO, JR. of the County Court at Law of Hidalgo County, Texas,

Given under my hand and seat of office, at Edinburg, Texas, this the 18th day of November, 2019.

Deputy



ATTEST: ARTURO GUAJARDO, JR.
 COUNTY CLERK, HIDALGO COUNTY, TEXAS
 100 N CLOSNER
 EDINBURG, TEXAS 78539
 COUNTY COURT AT LAW #6

Taxed _____

By: Aurelio Aleman Deputy
 AURELIO ALEMAN

Return Recorded _____

SHERIFF'S RETURN

Came to hand the 18 day of NOV, 2019, at 8:30 o'clock A.M.,
 and executed the 18 day of NOV, 2019, at 11:31 o'clock, P.M., by
 delivering to the within named Defendant LA JOLLA CITY COUNCIL JOSE ALDO PEREZ SALAZAR
 at LA JOLLA in HIDALGO County, Texas, in person, a
 true copy of this Writ of Temporary Restraining Order and Notice, and the accompanying
 copy of Plaintiff's Petition.

Fees - - \$ _____

J. E. "Eddie" Guerra, Hidalgo County Sheriff

Mileage - _____

By: Jose Aldo Perez Salazar, Deputy

Total - - \$ _____

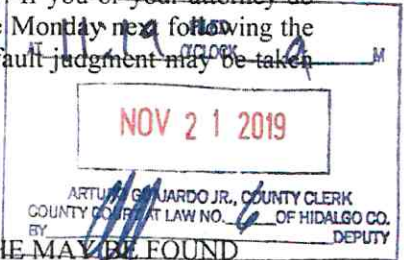
WRIT OF TEMPORARY RESTRAINING ORDER AND
 NOTICE

CAUSE NO. CL-19-6054-F

THE STATE OF TEXAS
COUNTY OF HIDALGO

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you."

To: LA JOYA CITY COUNCIL
BY SERVING ITS REGISTERED AGENT
JOSE ADOLFO SALINAS
701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER HE MAY BE FOUND
OR JACQUELINE SALINAS BAZAN
701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER SHE MAY BE FOUND



GREETINGS: You are commanded to appear by filing a written answer to the Plaintiff's petition at or before 10 o'clock A.M. on or before the Monday next after the expiration of twenty (20) days after the date of service hereof, before the Honorable County Court At Law #6 of Hidalgo County, Texas, by and through the Hidalgo County Clerk at 100 N. Closner, First Floor, Edinburg, Texas 78539.

Said Plaintiff's Petition was filed in said Court, on the 18th day of November, 2019 in this Cause Numbered CL-19-6054-F on the docket of said Court, and styled,

ISIDRO CASANOVA
vs.
JOSE ADOLFO SALINAS; JAQUELINE SALINAS

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this Citation and made a part hereof.

NAME & ADDRESS OF ATTORNEY FOR PLAINTIFF:
ROBERTO JACKSON, JR.
412 PALMVIEW COMMERCIAL DRIVE
PALMVIEW TX 78574

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF SAID COURT, at Edinburg, Texas this 18th day of November, 2019.



ARTURO GUAJARDO, JR.
COUNTY CLERK, HIDALGO COUNTY, TEXAS
100 N. CLOSNER
EDINBURG, TEXAS 78539
COUNTY COURT AT LAW #6

BY Aurelio Aleman DEPUTY
AURELIO ALEMAN

SHERIFF'S/CONSTABLE'S/CIVIL PROCESS

SHERIFF'S RETURN

Came to hand on the 18 day of Nov, 2019, at 830 o'clock 12 M., by Deputy (Sheriff/Constable)/Civil Process Server and to-wit the following:

DEFENDANT SERVED

Service was EXECUTED on the above referenced Defendant, in person, in Hidalgo County, Texas and served with a true copy of this Citation, with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Petition, at the following Date, time, and place, to-wit:

NAME CITY OF EL PASO DATE 11-18-19 TIME 9:30 AM PLACE 701 G. E. FLORES WAY / 2
JULIE ADOLFO SALINAS SAHINTS BAZAN
 By: Juan Paez By: SAHINTS BAZAN
 CIVIL PROCESS SERVER DEPUTY SHERIFF/CONSTABLE

DEFENDANT NOT SERVED

Service was ATTEMPTED at the above address on the above referenced Defendant on the following date(s) and time(s), but to no avail:

NAME _____ DATE _____ TIME _____ PLACE _____

NAME _____ DATE _____ TIME _____ PLACE _____

NAME _____ DATE _____ TIME _____ PLACE _____

By: _____
 CIVIL PROCESS SERVER

By: _____
 DEPUTY SHERIFF/CONSTABLE

**COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF,
 CONSTABLE OR CLERK OF THE COURT**

In accordance to rule 107, the officer or authorized person who serves or attempts to serve a citation must sign the return. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return must either be verified or be signed under the penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is FRANK PAEZ, my date of birth is 1-8-46 and my address is PO BOX 2306 STAPLE
PO BOX 2306 STAPLE I declare under penalty of perjury that the foregoing is true and correct

EXECUTED in Alamo County, state of Texas, on the 18 day of Nov, 20 19.

DECLARANT

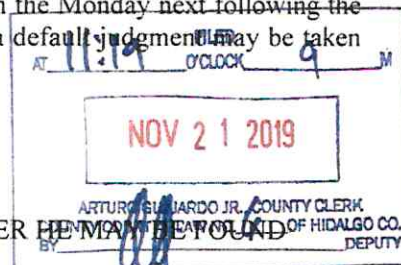
Juan Paez
93021-7327
 If Certified by the Supreme Court of Texas
 Date of Expiration /SCH Number

CAUSE NO. CL-19-6054-F

THE STATE OF TEXAS
COUNTY OF HIDALGO

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you."

To: CITY OF LA JOYA
BY SERVING ITS REGISTERED AGENT
JOSE ADOLFO SALINAS
701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER HE MAY BE FOUND
OR JACQUELINE SALINAS BAZAN
701 EAST EXPRESSWAY 83 LA JOYA TX 78560 OR WHEREVER SHE MAY BE FOUND



GREETINGS: You are commanded to appear by filing a written answer to the Plaintiff's petition at or before 10 o'clock A.M. on or before the Monday next after the expiration of twenty (20) days after the date of service hereof, before the Honorable County Court At Law #6 of Hidalgo County, Texas, by and through the Hidalgo County Clerk at 100 N. Closner, First Floor, Edinburg, Texas 78539.

Said Plaintiff's Petition was filed in said Court, on the 18th day of November, 2019 in this Cause Numbered CL-19-6054-F on the docket of said Court, and styled,

ISIDRO CASANOVA

vs.

JOSE ADOLFO SALINAS; JAQUELINE SALINAS

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Original Petition accompanying this Citation and made a part hereof.

NAME & ADDRESS OF ATTORNEY FOR PLAINTIFF:

ROBERTO JACKSON, JR.
412 PALMVIEW COMMERCIAL DRIVE
PALMVIEW TX 78574

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF SAID COURT, at Edinburg, Texas this 18th day of November, 2019.



ARTURO GUJARDO, JR.
COUNTY CLERK, HIDALGO COUNTY, TEXAS
100 N. CLOSNER
EDINBURG, TEXAS 78539
COUNTY COURT AT LAW #6

BY

Aurelio Aleman

DEPUTY

AURELIO ALEMAN

SHERIFF'S/CONSTABLE'S/CIVIL PROCESS

SHERIFF'S RETURN

Came to hand on the 18 day of Nov, 20 19, at 8:30 o'clock A
M., by Deputy (Sheriff/Constable)/Civil Process Server and to-wit the following:

DEFENDANT SERVED

Service was EXECUTED on the above referenced Defendant, in person, in Hidalgo County, Texas and served with a true copy of this Citation, with the date of delivery endorsed thereon, together with the accompanying copy of the Plaintiff's Petition, at the following Date, time, and place, to-wit:

NAME LAJOYA CITY Council DATE 11-18-19 TIME 2:00 PM PLACE 700 E. JS By H. J. S. LAJOYA
By: [Signature] CIVIL PROCESS SERVER By: [Signature] DEPUTY SHERIFF/CONSTABLE

DEFENDANT NOT SERVED

Service was ATTEMPTED at the above address on the above referenced Defendant on the following date(s) and time(s), but to no avail:

NAME _____ DATE _____ TIME _____ PLACE _____

NAME _____ DATE _____ TIME _____ PLACE _____

NAME _____ DATE _____ TIME _____ PLACE _____

By: _____ CIVIL PROCESS SERVER By: _____ DEPUTY SHERIFF/CONSTABLE

**COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF,
CONSTABLE OR CLERK OF THE COURT**

In accordance to rule 107, the officer or authorized person who serves or attempts to serve a citation must sign the return. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return must either be verified or be signed under the penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is R. J. ANDERSON, my date of birth is 1-2-46 and my address is

PO Box 2300, Amber. I declare under penalty of perjury that the foregoing is true and correct

EXECUTED in Hidalgo County, state of Texas, on the 18 day of Nov, 20 19.

[Signature]
DECLARANT

930 21-7321
If Certified by the Supreme Court of Texas
Date of Expiration /SCH Number

EXHIBIT E

LIST OF COUNSEL

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

ISIDRO CASANOVA
Petitioner,

VS

CITY OF LA JOYA AND
THE LA JOYA CITY COUNCIL
Respondents.

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§

CIVIL ACTION NO.: _____

LIST OF COUNSEL

Pursuant to 28 U.S.C. § 1446(a) and Local Rule CV-81, the following is a List of Counsel of Record being filed with this Notice of Removal:

Counsel for Isidro Casanova:

Roberto Jackson, Jr.
412 Palmview Commercial Dr.
Palmview, Texas 78574
Email: robertojackson43@gmail.com
Telephone: (956) 585-6938
Telecopier: (956) 581-8020

Counsel for City of La Joya and La Joya City Council:

Kennedy Salinas
Kennedy Salinas Law Firm, PLLC
2112 S. Shary Road
Mission, Texas 78572
Telephone No. 956-488-1000
Facsimile No. 956-435-0252
Email: kennedysalinaslaw@gmail.com

Respectfully submitted,
/s/ Kennedy Salinas
Kennedy Salinas
Federal I.D. No. 430660

State Bar No. 24041850
Kennedy Salinas Law Firm, PLLC
2112 S. Shary Road
Mission, Texas 78572
Telephone No. 956-488-1000
Facsimile No. 956-435-0252

CERTIFICATION OF SERVICE

I hereby certify that on November ~~23~~, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system in which will send notification of such filing to all attorneys of record. I further certify that true and correct copies of the foregoing were served by electronic mail on the following:

Roberto Jackson, Jr.
412 Palmview Commercial Dr.
Palmview, Texas 78574
Email: robertojackson43@gmail.com

/s/ Kennedy Salinas
KENNEDY SALINAS
Federal I.D. No. 430660

EXHIBIT F

INDEX OF MATTERS BEING FILED

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

ISIDRO CASANOVA
Petitioner,

VS

CITY OF LA JOYA AND
THE LA JOYA CITY COUNCIL
Respondents.

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CIVIL ACTION NO.: _____

INDEX OF MATTERS BEING FILED

Pursuant to 28 U.S.C. § 1446(a) and Local Rule CV-81, the following items are being filed with this Notice of Removal:

1. Notice of Removal
2. Hidalgo County District Court Docket Sheet;
3. Plaintiff's Original Petition, Request for Temporary Restraining Order and
Declaratory judgment;
4. Temporary Restraining Order;
5. Return Service;
6. List of Counsel;
7. Index of Matters being Filed.

Respectfully submitted,
/s/ Kennedy Salinas
Kennedy Salinas
Federal I.D. No. 430660
State Bar No. 24041850
Kennedy Salinas Law Firm, PLLC
2112 S. Shary Road

Mission, Texas 78572
Telephone No. 956-488-1000
Facsimile No. 956-435-0252

CERTIFICATION OF SERVICE

I hereby certify that on November ~~21~~²³, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system in which will send notification of such filing to all attorneys of record. I further certify that true and correct copies of the foregoing were served by electronic mail on the following:

Roberto Jackson, Jr.
412 Palmview Commercial Dr.
Palmview, Texas 78574
Email: robertojackson43@gmail.com

/s/ Kennedy Salinas
KENNEDY SALINAS
Federal I.D. No. 430660